

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

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In re:

Case No. 20-30663

The Roman Catholic Diocese of Syracuse,  
New York,

Chapter 11

Debtor.

Judge Wendy A. Kinsella

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**SUMMARY SHEET FOR THE FIFTH INTERIM APPLICATION OF  
BURNS BAIR LLP, SPECIAL INSURANCE COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

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Name of Applicant:	Burns Bair LLP
Authorized to Provide Professional Services to:	The Official Committee of Unsecured Creditors
Date of Retention:	September 7, 2021 [ECF No. 671]
Period for which compensation and reimbursement is sought:	March 1, 2023 – July 31, 2023 (the “ <u>Compensation Period</u> ”)
Amount of Compensation sought as actual, reasonable and necessary:	\$179,728.10
Amount of Expense Reimbursement sought as actual, reasonable and necessary:	\$9,219.57 <sup>1</sup>
This is a(n)	<input type="checkbox"/> Monthly <input checked="" type="checkbox"/> Interim <input type="checkbox"/> Final application

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<sup>1</sup> This expense amount reflects a reduction of \$80.90 for PACER fees that were included on Burns Bair’s invoice for April time.

**SUMMARY OF MONTHLY FEE STATEMENTS FOR COMPENSATION PERIOD**

		<b>Requested</b>		<b>Approved/Unopposed</b>		
<b>Date Filed</b>	<b>Period Covered</b>	<b>Fees</b>	<b>Expenses</b>	<b>Fees</b>	<b>Expenses</b>	<b>Amount Received</b>
4/21/2023 [ECF 1253]	3/1/23 – 3/31/23	\$41,915.60 (80% of \$52,394.50)	\$3,715.28	\$41,915.60 (80% of \$52,394.50)	\$3,715.28	\$45,630.88
5/31/2023 [ECF 1298]	4/1/23 – 4/30/23	\$20,872.00 (80% of \$26,090.00)	\$1,967.79	\$20,872.00 (80% of \$26,090.00)	\$1,967.79	\$22,839.79
6/22/2023 [ECF 1314]	5/1/23 – 5/31/23	\$7,294.00 (80% of \$9,117.50)	\$0	\$7,294.00 (80% of \$9,117.50)	\$0	\$7,294.00
7/21/2023 [ECF 1341]	6/1/23 – 6/30/23	\$40,113.20 (80% of \$50,141.50)	\$3,617.40	\$40,113.20 (80% of \$50,141.50)	\$3,617.40	\$43,730.60
8/24/2023 [ECF 1377]	7/1/23 – 7/31/23	\$33,587.68 (80% of \$41,984.60)	\$0	\$33,587.68 (80% of \$41,984.60)	\$0	\$33,587.68
<b>Total</b>		\$143,782.48 (80% of \$179,728.10)	\$9,300.47	\$143,782.48 (80% of \$179,728.10)	\$9,300.47 <sup>2</sup>	\$153,082.95

**SUMMARY OF PRIOR INTERIM FEE APPLICATIONS**

		<b>Requested</b>		<b>Approved</b>	
<b>Date Filed</b>	<b>Period Covered</b>	<b>Fees</b>	<b>Expenses</b>	<b>Fees</b>	<b>Expenses</b>
11/17/21 [ECF 745]	9/7/21- 9/30/21	\$3,882.50	\$0.00	\$3,882.50	\$0.00
5/27/22 [ECF 910]	10/1/21- 2/28/22	\$1,082.50	\$229.70	\$1,082.50	\$229.70
11/17/22 [ECF 1102]	3/1/22- 8/31/22	\$16,162.00	\$219.80	\$16,162.00	\$219.80
5/23/23 [ECF 1281]	9/1/22 – 2/28/23	\$357,073.50	\$14,147.44	\$344,573.50	\$10,965.44
<b>Total</b>		<b>\$378,200.50</b>	<b>\$14,596.94</b>	<b>\$365,700.50</b>	<b>\$11,414.94</b>

**SUMMARY OF PROFESSIONALS**

<b>Name of Professional</b>	<b>Title</b>	<b>Hourly Rate</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Timothy Burns	Partner	\$700.00	87.60	\$61,320.00
Timothy Burns –Travel Rate		\$350.00	42.90	\$15,015.00
Jesse Bair	Partner	\$625.00	73.40	\$45,875.00
Jesse Bair –Travel Rate		\$312.50	28.20	\$8,812.50
Nathan Kuenzi	Associate	\$420.00	9.50	\$3,990.00
Brian Cawley	Associate	\$420.00	48.80	\$20,496.00
Leakhena Au	Associate	\$420.00	50.20	\$21,084.00
Katie Sticklen	Associate	\$378.00	4.20	\$1,587.60
Karen Dempski	Paralegal	\$360.00	.30	\$108.00
Alyssa Turgeon	Paralegal	\$360.00	4.00	\$1,440.00
<b>Total</b>			349.10	\$179,728.10

<sup>2</sup> As noted earlier, the firm is only seeking reimbursement of \$9,219.57 in expenses, reflecting a reduction of \$80.90 for PACER fees included on its invoice for April time.

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

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In re:

Case No. 20-30663

The Roman Catholic Diocese of Syracuse,  
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**FIFTH INTERIM APPLICATION OF BURNS BAIR LLP,  
SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS, FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES**

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Pursuant to 11 U.S.C. §§ 327, 330 and 331, Fed Bankr. P. 2016, Local Rule 2016-1, and the Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees* [ECF No. 117] (the “Interim Compensation Order”), Burns Bair LLP (“Burns Bair”), special insurance counsel to the Official Committee of Unsecured Creditors (the “Committee”), respectfully submits this fifth interim application for the allowance of compensation and reimbursement of actual and necessary expenses (the “Application”) for services performed as counsel to the Committee from March 1, 2023 through July 31, 2023 (the “Compensation Period”).

**JURISDICTION**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, Fed. R. Bankr. P. 5005. This Application arises under 11 U.S.C. §§ 327, 331, and 330. This Application is filed pursuant to Fed. R. Bankr. P. 2016, Local Rule 2016-1, and the Interim Compensation Order. This is a core proceeding.

## **BACKGROUND**

2. On June 19, 2020, The Roman Catholic Diocese of Syracuse filed a voluntary petition for relief under Chapter 11 of Title 11 of the Bankruptcy Code.

3. On July 9, 2020, the Office of the United States Trustee appointed seven members to the Committee [ECF No. 38].

4. On July 24, 2021, the Committee selected Burns Bair to serve as special insurance counsel to the Committee.

5. On July 28, 2021, the Committee filed an application seeking to retain Burns Bair as special insurance counsel to the Committee (the “Employment Application”) [ECF No. 604]. On September 7, 2021, the Court granted the Employment Application [ECF No. 671]. A copy of the Court’s order granting the Employment Application is attached hereto as **Exhibit A**.

6. Burns Bair has not received a retainer in connection with this proceeding.

7. No plan has been confirmed in this case.

## **SUMMARY OF SERVICES PROVIDED TO THE COMMITTEE DURING THE COMPENSATION PERIOD**

8. During the Compensation Period, Burns Bair provided legal services to the Committee including, but not limited to: preparing for and participating in multiple in-person and Zoom mediation sessions; continued detailed analysis and legal research regarding New York insurance law with respect to various issues impacting the insurance claims and related strategy; analysis of insurance issues in connection with the Committee/Diocese Plan of Reorganization; analysis regarding Arrowood insolvency issues and strategy in connection with recovering from Arrowood and/or the New York Insurance Guarantee Fund; drafting insurance demand letters; drafting potential motions for summary judgment on various issues, including Travelers’ owners, landlords, and tenants (OLT) argument, the number of occurrences issue, and the impact of LMI/Interstate’s lack of a consent to settle provision; continued research and assessment regarding

the insurers' purported coverage defenses; presenting to the Committee and state court counsel on insurance issues and strategy; and formulating overall insurance strategy on behalf of the Committee. In total, during the Compensation Period Burns Bair provided reasonable and valuable services to the Committee in the amount of \$179,728.10 and incurred reasonable and necessary expenses in the amount of \$9,219.57. Attached hereto as **Exhibit B** is a copy of Burns Bair's itemized invoice for the Compensation Period, which includes a description of the tasks performed, the names of the professionals who worked on the task, the time worked on the task, and the amount charged for the task. Burns Bair submits that its fees and expenses were actual, necessary, and reasonable under the circumstances of this case and should be allowed.

9. All services performed by Burns Bair were necessary to the administration of this case or were beneficial toward the successful completion of this case at the time such services were rendered. The services were performed in a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed. The amount requested in this Application is reasonable compensation for actual and necessary services rendered by Burns Bair based on the nature, extent, and value of such services, the time spent on such services, and the cost of comparable services other than in cases under Title 11 of the United States Code.

10. Burns Bair submits that the compensation it seeks is reasonable as compared to the market. Burns Bair has consistently billed at or near the rates it has billed in other committee related representations in diocesan bankruptcy cases. The rates Burns Bair charges are in line with or below the rates charged by similar professionals in diocesan bankruptcy cases.

11. All services for which Burns Bair requests compensation were performed on behalf of the Committee and not on behalf of any other person. Burns Bair has not entered into any agreement to fix fees or to share compensation as prohibited by 18 U.S.C. § 155 and 11 U.S.C. § 504.

12. Burns Bair believes that the Debtor has the ability to pay the fees requested herein and those fees and expenses requested by other estate professionals.

**LEGAL BASIS**

13. This Court is authorized to award to professional persons employed by section 1103 of the Bankruptcy Code "reasonable compensation for actual, necessary services rendered by the ... attorney[s] and by any paraprofessional person[s] employed by any such person, and ... reimbursement for actual, necessary expenses." 11 U.S.C. § 330. The Court must consider the nature, extent, and value of such services, taking into account all relevant factors to determine whether the request for payment in connection with such services is fair and reasonable. *Id.* The services Burns Bair provided during the Compensation Period were actual, reasonable, and necessary services on behalf of the Committee, and the fees and expenses requested in this Application are fair and reasonable under the circumstances of this case.

**CONCLUSION**

WHEREFORE, Burns Bair respectfully requests that the Court enter an order, substantially in the form of **Exhibit C**: (i) granting the Application; (ii) allowing Burns Bair's fees and expenses for the Compensation Period in the amount of \$188,947.67; (iii) authorizing and directing the Debtor to pay Burns Bair its allowed fees and expenses; and (iv) granting such other relief as is just and proper.

Date: November 9, 2023

/s/ *Timothy Burns*

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Timothy Burns (WI Bar No.1068086)

Jesse Bair (WI Bar No. 1083779)

**Burns Bair LLP**

10 E. Doty Street, Suite 600

Madison, WI 53703

Main: 608-286-2302

Email: [tburns@burnsbair.com](mailto:tburns@burnsbair.com)

[jbair@burnsbair.com](mailto:jbair@burnsbair.com)

*Special Insurance Counsel for the Official  
Committee of Unsecured Creditors*

**VERIFICATION**

I, Timothy Burns, a partner of the applicant named in the foregoing *Fifth Interim Application of Burns Bair LLP, Special Insurance Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses*, declare under penalty of perjury that the foregoing is true and correct according to the best of my knowledge, information, and belief.

Date: November 9, 2023

/s/ Timothy Burns

Timothy Burns, Esq.

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

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In re:

Case No. 20-30663

The Roman Catholic Diocese of Syracuse,  
New York,

Chapter 11

Debtor.

Judge Wendy A. Kinsella

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**CERTIFICATION OF KEVIN LAWRENCE, TREASURER OF THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS, REGARDING FIFTH INTERIM FEE  
APPLICATION OF BURNS BAIR LLP**

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I, Kevin Lawrence, certify that I have reviewed the *Fifth Interim Application of Burns Bair LLP, Special Insurance Counsel to the Official Committee of Unsecured Creditors, For Allowance of Compensation and Reimbursement of Expenses* filed by Burns Bair LLP, and

Check one:

I do not object to allowance of the application and payment of fees and expenses in full  
as the services rendered and fees charged appear reasonable; or

I object to the application and to payment of the fees and expenses in full in the amounts  
and for the reasons set forth below:

Date: November 6, 2023.

/s/ Kevin Lawrence

Kevin Lawrence  
Treasurer of the Committee

## **EXHIBIT A**

So Ordered.

Signed this 7 day of September, 2021.



Wendy A. Kinsella  
United States Bankruptcy Judge

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK**

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In re:

Case No. 20-30663

The Roman Catholic Diocese of Syracuse,  
New York,

Chapter 11

Debtor.

Judge Wendy A. Kinsella

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**ORDER APPROVING EMPLOYMENT OF BURNS BOWEN BAIR LLP AS  
SPECIAL INSURANCE COUNSEL FOR THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS**

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Based on the Official Committee of Unsecured Creditors' *Application to Employ Burns Bowen Bair LLP as Special Insurance Counsel for the Official Committee of Unsecured Creditors* [ECF No. 604], the *Supplement to Application to Employ Burns Bowen Bair LLP as Special Insurance Counsel for the Official Committee of Unsecured Creditors* [ECF No. 638], and the *Supplemental Declaration of Timothy Burns in Support of the Supplement to Application to Employ Burns Bowen Bair LLP as Special Insurance Counsel for the Official Committee of Unsecured Creditors* [ECF No. 638, Ex. A],

IT IS ORDERED:

1. The Committee is authorized to employ Burns Bowen Bair LLP as its special insurance counsel pursuant to 11 U.S.C. § 327 of the Bankruptcy Code.
2. No fee shall be paid to Burns Bowen Bair LLP, including the use of any retainer received for post-petition services, without prior approval of the Court.

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## **EXHIBIT B**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
[www.BurnsBair.com](http://www.BurnsBair.com)

**Official Committee of Unsecured Creditors of  
the Diocese of Syracuse, New York**

**Issue Date :** 4/3/2023  
**Bill # :** 01123

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

<b>Date</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Hours</b>	<b>Amount</b>
3/1/2023	Jesse Bair	Review correspondence with L. Kugler and state court counsel re upcoming case strategy call (.1);	0.10	\$62.50
3/6/2023	Jesse Bair	Analysis re insurance strategy for upcoming mediation session (.1); conference with T. Burns re same (.1);	0.20	\$125.00
3/6/2023	Timothy Burns	Conference with J. Bair re insurance strategy for upcoming mediation session (.1);	0.10	\$70.00
3/7/2023	Jesse Bair	Review correspondence from E. Caldie re upcoming mediation session (.1); participate in meeting with state court counsel re upcoming mediation session and overall case strategy (.8);	0.90	\$562.50
3/9/2023	Jesse Bair	Review and respond to correspondence with the mediator re upcoming mediation sessions (.2);	0.20	\$125.00
3/9/2023	Jesse Bair	Participate in conference with T. Burns re insurance strategy for upcoming mediation session (.1);	0.10	\$62.50
3/9/2023	Jesse Bair	Participate in conference with T. Burns re potential direction action claims against the Diocese's insurers (.1);	0.10	\$62.50
3/9/2023	Timothy Burns	Meet with J. Bair re mediation preparations (.1); review correspondence from the mediator re upcoming mediation sessions (.1); review additional correspondence from the mediator re mediation session and Arrowood issues (.1); review emails from Stinson re mediation sessions (.1); review and edit memorandum re potential direct claims against the Diocese's insurers (.8);	1.20	\$840.00
3/10/2023	Leakhena Au	Participate in conference with T. Burns re issues in connection with potential direct claims against the Diocese's insurers (.2);	0.20	\$84.00

3/10/2023 Timothy Burns	Continue detailed review and revisions to draft memorandum re potential direct claims against the Diocese's insurers (3.2); analyze New York case law in connection with same (3.0); conference with L. Au re same (.2); conference with B. Cawley re punitive damages research (.1); review B. Cawley's email memorandum re same (.1); call with J. Bair re potential direct claims against the Diocese's insurers (.1); participate in call with R. Kugler re same (.1);	6.80	\$4,760.00
3/10/2023 Brian Cawley	Discuss research assignment on punitive damages with T. Burns (.1); analysis re procedural requirements for pleading punitive damages in New York (.8);	0.90	\$378.00
3/10/2023 Jesse Bair	Review correspondence with T. Burns and Stinson re potential direct claims against the Diocese's insurers (.1);	0.10	\$62.50
3/10/2023 Jesse Bair	Correspondence with the mediator re April mediation session (.1);	0.10	\$62.50
3/11/2023 Timothy Burns	Review correspondence with the mediator and J. Bair re April mediation session (.1);	0.10	\$70.00
3/13/2023 Timothy Burns	Participate in call with R. Kugler re meeting with state court counsel re potential direct claims against the Diocese's insurers (.2); exchange emails with K. Phillips re same (.1); meet with B. Cawley re creation of PowerPoint presentation re potential claims against the Diocese's insurers (.1); meet with team re ongoing projects and case strategy (.2);	0.60	\$420.00
3/13/2023 Nathan Kuenzi	Participate in team meeting re case strategy and ongoing projects (.2);	0.20	\$84.00
3/13/2023 Leakhena Au	Participate in team meeting re case strategy and ongoing projects (.2);	0.20	\$84.00
3/13/2023 Brian Cawley	Participate in team meeting regarding case status and assignments (.2);	0.20	\$84.00
3/13/2023 Brian Cawley	Analyze draft memorandum re potential direct claims against the Diocese's insurers (.8); create PowerPoint presentation for state court counsel re same and related insurance issues (3.8);	4.60	\$1,932.00
3/13/2023 Jesse Bair	Review and respond to correspondence with the Diocese re upcoming mediation session (.1);	0.10	\$62.50
3/13/2023 Jesse Bair	Conference with internal team re ongoing projects and case strategy (.2);	0.20	\$125.00
3/14/2023 Leakhena Au	Conference with B. Cawley re potential claim for punitive damages against the Diocese's insurers (.2);	0.20	\$84.00
3/14/2023 Brian Cawley	Continue drafting PowerPoint presentation re potential claims against the Diocese's insurers (2.5); research New York law re the recoverability of punitive damages against the Diocese's insurers (2.2); correspond with T. Burns regarding same (.3); discuss punitive damage case law issues with L. Au (.2); draft summary of punitive damages analysis (.6);	5.80	\$2,436.00
3/14/2023 Jesse Bair	Participate in conference with T. Burns re case insurance strategy (.1);	0.10	\$62.50

3/14/2023 Jesse Bair	Review correspondence with L. Kugler re upcoming Committee meeting (.1);	0.10	\$62.50
3/14/2023 Jesse Bair	Review correspondence with T. Burns, state court counsel, and Stinson re call to discuss potential direct claims against the Diocese's insurers (.1);	0.10	\$62.50
3/14/2023 Jesse Bair	Review and edit current draft of memorandum re potential direct claims against the Diocese's insurers (.3);	0.30	\$187.50
3/14/2023 Jesse Bair	Review draft PowerPoint presentation for state court counsel re potential direct claims against the Diocese's insurers (.2); review correspondence with T. Burns and B. Cawley re same and recoverability of punitive damages (.1);	0.30	\$187.50
3/14/2023 Timothy Burns	Correspondence with K. Phillips re potential direct claims against the Diocese's insurers (.1); participate in call with K. Phillips re research re same (.2); additional research and email to K. Phillips re same (.1); correspondence with state court counsel re potential claims against the Diocese's insurers (.4); meet with J. Bair re same (.1); participate in call with R. Kugler re same (.1); participate in call with state court counsel re same (.1); meet with B. Cawley re presentation draft (.1); meet with B. Cawley re punitive damages research (.2); follow-up correspondence with B. Cawley re same (.2); participate in additional call with R. Kugler re presentation to state court counsel (.2);	1.80	\$1,260.00
3/14/2023 Leakhena Au	Prepare for call with Stinson regarding potential direct claims against the Diocese's insurers (.3);	0.30	\$126.00
3/14/2023 Leakhena Au	Participate in conference with Stinson to discuss potential direct claims against the Diocese's insurers (.2); follow up on action items from meeting (.1);	0.30	\$126.00
3/15/2023 Jesse Bair	Participate in conference with Stinson team, state court counsel, and T. Burns re case insurance strategy (.7); participate in follow-up call with T. Burns re same (.1); participate in additional call with T. Burns and state court counsel re same (.1);	0.90	\$562.50
3/15/2023 Timothy Burns	Prepare for call with state court counsel and Stinson team re case insurance strategy (.8); participate in call with state court counsel and Stinson team re same (.7); participate in post-call with J. Bair re same (.1); participate in additional call with R. Kugler re same (.1); participate in additional call with state court counsel re same (.1);	1.80	\$1,260.00
3/16/2023 Timothy Burns	Participate in portion of Committee meeting re mediation strategy (.5);	0.50	\$350.00
3/16/2023 Jesse Bair	Participate in Committee meeting re mediation strategy (.6); review correspondence from the Debtor re upcoming mediation (.1);	0.70	\$437.50
3/18/2023 Jesse Bair	Review the Diocese's mediation response letter (.2);	0.20	\$125.00
3/19/2023 Jesse Bair	Draft insurance summary overview for use at upcoming mediation session (1.0); correspondence with Committee member re same (.1);	1.10	\$687.50

3/19/2023 Jesse Bair	Analyze Travelers' exposure on parish claims (.5);	0.50	\$312.50
3/19/2023 Jesse Bair	Analyze Arrowood's exposure on parish claims (.2);	0.20	\$125.00
3/19/2023 Jesse Bair	Draft supplemental insurer exposure summary for use in connection with upcoming mediation (.5); correspondence with Stinson team re same (.1);	0.60	\$375.00
3/20/2023 Jesse Bair	Travel from Madison to Syracuse for mediation [billed at 1/2 travel rate] (7.3);	7.30	\$2,281.25
3/20/2023 Jesse Bair	Participate in conference with T. Burns re insurance mediation strategy (.3);	0.30	\$187.50
3/20/2023 Timothy Burns	Travel from Madison to Syracuse for mediation [billed at 1/2 travel rate] (7.3);	7.30	\$2,555.00
3/20/2023 Timothy Burns	Participate in conference with J. Bair re insurance mediation strategy (.3);	0.30	\$210.00
3/21/2023 Brian Cawley	Analysis re the ability of an injured party to provide notice instead of a policyholder under New York Insurance Law Section 3420 (1.8); draft summary of Section 3420 research (.2);	2.00	\$840.00
3/21/2023 Jesse Bair	Participate in day 1 of mediation session (9.0);	9.00	\$5,625.00
3/21/2023 Jesse Bair	Review B. Cawley email memorandum re notice issues under Section 3420 (.1);	0.10	\$62.50
3/21/2023 Timothy Burns	Participate in day 1 of mediation session (9.0);	9.00	\$6,300.00
3/22/2023 Timothy Burns	Participate in day 2 of mediation session (6.4);	6.40	\$4,480.00
3/22/2023 Timothy Burns	Return travel to Madison from mediation (6.5) [billed at 1/2 travel rate];	6.50	\$2,275.00
3/22/2023 Jesse Bair	Participate in day 2 of mediation session (6.4);	6.40	\$4,000.00
3/22/2023 Jesse Bair	Return travel to Madison from mediation (6.5) [billed at 1/2 travel rate];	6.50	\$2,031.25
3/23/2023 Nathan Kuenzi	Participate in team meeting re case status and projects (.2);	0.20	\$84.00
3/23/2023 Leakhena Au	Participate in team meeting re case status and related projects (.2);	0.20	\$84.00
3/23/2023 Nathan Kuenzi	Analyze proofs of claims identified by Catholic Mutual (1.9);	1.90	\$798.00
3/23/2023 Nathan Kuenzi	Draft summary of proofs of claim to inform response to issues raised by Catholic Mutual (.9);	0.90	\$378.00
3/23/2023 Brian Cawley	Participate in team meeting re case status and related projects (.2);	0.20	\$84.00
3/23/2023 Brian Cawley	Additional research re claimant notice requirements under New York Insurance Law Section 3420 (.3); draft summary of research findings (.1);	0.40	\$168.00
3/23/2023 Nathan Kuenzi	Prepare for conference with J. Bair re Catholic Mutual project (.2); participate in discussion with J. Bair re supplemental analysis needed in connection with Catholic Mutual exposure (.2);	0.40	\$168.00
3/23/2023 Timothy Burns	Participate in BB team meeting re case developments and related projects (.2);	0.20	\$140.00
3/23/2023 Jesse Bair	Participate in BB team meeting re case developments and associated projects (.2);	0.20	\$125.00

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3/23/2023 Jesse Bair	Provide instructions to N. Kuenzre supplemental analysis needed in connection with Catholic Mutual exposure (.2);	0.20	\$125.00	Main Document Page 17 of 36
3/24/2023 Timothy Burns	Review B. Cawley email memorandum re Section 3420 notice issues (.1);	0.10	\$70.00	
3/27/2023 Jesse Bair	Review correspondence from the mediator re April mediation session (.1);	0.10	\$62.50	
3/28/2023 Jesse Bair	Update insurance overview summary in light of most recent mediation session (.2);	0.20	\$125.00	
3/28/2023 Jesse Bair	Analyze N. Kuenzi email summary re Catholic Mutual claims and asses potential insurance exposure issues re same (.2);	0.20	\$125.00	
3/31/2023 Jesse Bair	Correspondence with L. Kugler re valuation issues re adult abuse claims and insurer exposures re same (.1);	0.10	\$62.50	

<b>Total Hours and Fees</b>	<b>99.60</b>	<b>\$52,394.50</b>
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### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
3/20/2023	Delta Airlines Wi-Fi, J. Bair	\$4.95
3/20/2023	Uber, J. Bair and T. Burns (airport to hotel)	\$50.10
3/20/2023	Hotel, J. Bair (2 nights)	\$696.26
3/20/2023	Travel meal, J. Bair	\$6.89
3/20/2023	Hotel, T. Burns (2 nights)	\$732.10
3/20/2023	Travel meal, T. Burns	\$23.56
3/20/2023	Travel meal, T. Burns	\$18.74
3/20/2023	Delta Airlines, J. Bair (MSN-SYR, March 20-23)	\$1,036.40
3/20/2023	Delta Airlines, T. Burns (MSN-SYR, March 20-23)	\$1,036.40
3/21/2023	Travel meal, J. Bair	\$22.36
3/22/2023	Airport parking, J. Bair	\$30.00
3/22/2023	Airport parking, T. Burns	\$30.00
3/22/2023	Uber, J. Bair and T. Burns (mediation to airport)	\$27.52

<b>Total Expenses</b>	<b>\$3,715.28</b>
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### Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brian Cawley	14.10	\$420.00	\$5,922.00
Jesse Bair	13.80	\$312.50	\$4,312.50
Jesse Bair	24.00	\$625.00	\$15,000.00
Leakhena Au	1.40	\$420.00	\$588.00
Nathan Kuenzi	3.60	\$420.00	\$1,512.00
Timothy Burns	13.80	\$350.00	\$4,830.00
Timothy Burns	28.90	\$700.00	\$20,230.00

**Total Due This Invoice: \$56,109.78**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
[www.BurnsBair.com](http://www.BurnsBair.com)

**Official Committee of Unsecured Creditors of  
the Diocese of Syracuse, New York**

**Issue Date :** 5/5/2023  
**Bill # :** 01145

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

<b>Date</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Hours</b>	<b>Amount</b>
4/3/2023	Jesse Bair	Analyze latest version of insurer exposure analysis in preparation for call with Claro (.2); preliminary review of adult claims filed to date (.1); participate in call with Claro re revised insurer exposure analysis to account for new adult claims (.2);	0.50	\$312.50
4/4/2023	Timothy Burns	Conference with J. Bair re case insurance strategy (.2);	0.20	\$140.00
4/4/2023	Jesse Bair	Review Diocese notice of voluntary dismissal re certain parish insurers (.1); correspondence with R. Kulger re same (.1);	0.20	\$125.00
4/4/2023	Jesse Bair	Participate in conference with T. Burns re case insurance strategy (.2);	0.20	\$125.00
4/7/2023	Timothy Burns	Participate in call with state court counsel re insurance and mediation strategy (.2); participate in conference with J. Bair re same (.1);	0.30	\$210.00
4/7/2023	Jesse Bair	Preliminary review of Claro analysis re Adult Abuse Claims and insurer exposure (.2); correspondence with Claro re additional changes needed in connection with same (.1);	0.30	\$187.50
4/7/2023	Jesse Bair	Conference with T. Burns re insurance strategy issues (.1);	0.10	\$62.50
4/7/2023	Jesse Bair	Correspondence with N. Kuenzi re additional analysis needed of adult abuse claims re insurer exposures (.1);	0.10	\$62.50
4/10/2023	Jesse Bair	Participate in call with Stinson and T. Burns re Plan and insurance strategy (.8); follow-up conference with T. Burns re same and next-steps (.2);	1.00	\$625.00
4/10/2023	Jesse Bair	Review L. Kugler correspondence re upcoming Committee meeting and mediation session (.1);	0.10	\$62.50
4/10/2023	Timothy Burns	Participate in call with Stinson and J. Bair re Plan and insurance issues (.8); participate in follow-up conference with J. Bair re same and next-steps (.2);	1.00	\$700.00

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4/11/2023	Timothy Burns	Analysis of Plan insurance options and settlement strategies (1.2); call with R. Kugler re same (.4); met with J. Bair re same (.4); work re logistics of mediation (.3);	2.30	\$1,610.00	
4/11/2023	Jesse Bair	Participate in conference with T. Burns re Plan insurance options and potential settlement strategies (.4); follow-up correspondence with T. Burns re same and additional case law analysis (.1);	0.50	\$312.50	
4/12/2023	Jesse Bair	Participate in conference with T. Burns re consideration of insurance resolution strategy (.1); begin analyzing T. Burns PowerPoint presentation re same (.2);	0.30	\$187.50	
4/12/2023	Timothy Burns	Consideration of insurance resolution strategy (.4); call with R. Kugler re same (.1); met with J. Bair re same (.1); prepare PowerPoint re same (.8); email to J. Bair re PowerPoint and meeting re strategy (.1);	1.50	\$1,050.00	
4/13/2023	Timothy Burns	Participate in conference with Stinson team and J. Bair re insurance case strategy (.6); participate in post-conference meeting with J. Bair re same and potential next-steps (.1);	0.70	\$490.00	
4/13/2023	Jesse Bair	Participate in conference with Stinson team and T. Burns re insurance case strategy (.6); participate in post-conference meeting with T. Burns re same and potential next-steps (.1);	0.70	\$437.50	
4/13/2023	Jesse Bair	Review and edit T. Burns PowerPoint presentation re case insurance strategy (.4);	0.40	\$250.00	
4/14/2023	Alyssa Turgeon	Create Syracuse mediation prep binder for T. Burns (.5);	0.50	\$180.00	
4/14/2023	Jesse Bair	Prepare for Committee and state court counsel meeting (.1); participate in state court counsel and Committee meeting re mediation strategy for insurance purposes (.9);	1.00	\$625.00	
4/14/2023	Jesse Bair	Review updated Claro analysis re revised insurer exposure incorporating adult claims (.1);	0.10	\$62.50	
4/14/2023	Jesse Bair	Revise insurance overview chart (.1); draft insurance omnibus summary in preparation for upcoming mediation (.3);	0.40	\$250.00	
4/14/2023	Nathan Kuenzi	Analyze recently filed adult proofs of claim and assess potential coverage for same (.6);	0.60	\$252.00	
4/14/2023	Nathan Kuenzi	Draft summary of potential coverage implicated by adult proofs of claim for J. Bair (.4);	0.40	\$168.00	
4/14/2023	Timothy Burns	Participate in state court counsel and Committee meeting re mediation strategy for insurance purposes (.9);	0.90	\$630.00	
4/16/2023	Timothy Burns	Reviewed research memo and PowerPoint re potential avenues of recovery against insurers in bankruptcy (.6);	0.60	\$420.00	
4/17/2023	Timothy Burns	Travel from Madison to Syracuse for mediation [billed at 1/2 travel rate] (7.9);	7.90	\$2,765.00	
4/18/2023	Timothy Burns	Participate in day 1 of mediation session (8.3);	8.30	\$5,810.00	
4/19/2023	Timothy Burns	Participate in day 2 of mediation session (5.5);	5.50	\$3,850.00	

4/19/2023 Timothy Burns	Return travel to Madison from mediation [billed at 1/2 travel rate] (.6);	6.60	\$2,310.00
4/19/2023 Jesse Bair	Review and respond to correspondence with T. Burns re settlement status and mediation session outcome (.2);	0.20	\$125.00
4/20/2023 Timothy Burns	Participate in call with J. Bair re settlement status and developments (.1);	0.10	\$70.00
4/20/2023 Jesse Bair	Participate in call with T. Burns re settlement status and developments (.1);	0.10	\$62.50
4/21/2023 Jesse Bair	Analyze the mediator's proposal (.1); review correspondence with R. Kugler and state court counsel re same (.1);	0.20	\$125.00
4/22/2023 Jesse Bair	Review correspondence with state court counsel re mediator's proposal (.1);	0.10	\$62.50
4/25/2023 Timothy Burns	Participate in meeting with state court counsel, the Committee, and Stinson for insurance purposes re mediator's proposal and case next-steps (.6);	0.60	\$420.00
4/25/2023 Jesse Bair	Prepare for state court counsel and Committee meeting (.1); participate in meeting with state court counsel, the Committee, and Stinson for insurance purposes re mediator's proposal and case next-steps (.6);	0.70	\$437.50
4/25/2023 Jesse Bair	Review R. Kugler and state court counsel correspondence re insurer prompt payment requirements (.1);	0.10	\$62.50
4/26/2023 Jesse Bair	Review correspondence from the mediator re acceptance of the mediator's proposal (.1);	0.10	\$62.50
4/26/2023 Timothy Burns	Review correspondence with mediator re acceptance of mediator's proposal (.1);	0.10	\$70.00
4/27/2023 Jesse Bair	Participate in conference with T. Burns re next-steps re case insurance strategy (.1);	0.10	\$62.50
4/27/2023 Timothy Burns	Participate in conference with J. Bair re next-steps re case insurance strategy (.1);	0.10	\$70.00
4/28/2023 Jesse Bair	Correspondence with B. Horn re preparation of BB's fourth interim fee application (.1);	0.10	\$62.50
4/29/2023 Jesse Bair	Review correspondence from the mediator re upcoming insurance mediation session (.1);	0.10	\$62.50
4/30/2023 Jesse Bair	Correspondence with T. Burns re upcoming insurance mediation session (.1);	0.10	\$62.50

<b>Total Hours and Fees</b>	<b>46.00</b>	<b>\$26,090.00</b>
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### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
4/1/2023	First Quarter 2023 PACER (Public Access to Court Electronic Records)	\$80.90
4/17/2023	Delta Airlines, T. Burns (MSN-SYR April 17)	\$748.20
4/17/2023	Uber, T. Burns (airport to hotel)	\$32.73
4/17/2023	Hotel, T. Burns (2 nights)	\$509.60

4/17/2023	Travel meal, T. Burns	\$6.01
4/18/2023	Travel meal, T. Burns	\$6.01
4/19/2023	Travel meal, T. Burns	\$18.26
4/19/2023	Travel meal, T. Burns	\$4.63
4/19/2023	Travel meal, T. Burns	\$18.78
4/19/2023	Travel meal, T. Burns	\$4.00
4/19/2023	Uber, T. Burns (mediation to airport)	\$34.47
4/19/2023	United Airlines, T. Burns (SYR-MSN April 19)	\$504.20
<b>Total Expenses</b>		<b>\$1,967.79</b>

**Timekeeper Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	0.50	\$360.00	\$180.00
Jesse Bair	7.80	\$625.00	\$4,875.00
Nathan Kuenzi	1.00	\$420.00	\$420.00
Timothy Burns	14.50	\$350.00	\$5,075.00
Timothy Burns	22.20	\$700.00	\$15,540.00

**Total Due This Invoice: \$28,057.79**

# Burns | Bair

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**Official Committee of Unsecured Creditors of  
the Diocese of Syracuse, New York**

**Issue Date :** 6/7/2023  
**Bill # :** 01152

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

<b>Date</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Hours</b>	<b>Amount</b>
5/1/2023	Nathan Kuenzi	Participate in BB team conference re case developments and projects (.1);	0.10	\$42.00
5/1/2023	Leakhena Au	Participate in BB team meeting re case developments and projects (.1);	0.10	\$42.00
5/1/2023	Timothy Burns	Conference with internal team re case assignments and strategy (.1); review correspondence from the mediator re June mediation session (.1);	0.20	\$140.00
5/1/2023	Brian Cawley	Participate in BB team meeting re case developments and projects (.1);	0.10	\$42.00
5/1/2023	Jesse Bair	Participate in BB team conference re case developments and projects (.1);	0.10	\$62.50
5/3/2023	Jesse Bair	Review Mediation Session Directive received from the mediator (.1); review follow-up correspondence with the mediator re same and attendance of particular insurers (.1);	0.20	\$125.00
5/4/2023	Jesse Bair	Review E. Caldie correspondence re non-monetary settlement issues (.1);	0.10	\$62.50
5/8/2023	Timothy Burns	Conference with J. Bair re insurance adversary proceeding issues (.1); participate in supplemental conference with J. Bair re insurance mediation strategy (.3); participate in call with R. Kugler and J. Bair re insurance mediation and litigation strategy (.6);	1.00	\$700.00
5/8/2023	Jesse Bair	Participate in conference with T. Burns re insurance adversary proceeding issues (.1); participate in supplemental conference with T. Burns re insurance mediation strategy (.3); participate in call with R. Kugler and T. Burns re insurance mediation and litigation strategy (.6);	1.00	\$625.00
5/9/2023	Jesse Bair	Analysis re potential next-steps for insurance litigation and settlement strategy (.3); provide instructions to L. Au re preparing presentation summarizing same (.2);	0.50	\$312.50

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5/9/2023	Leakhena Au	Draft PowerPoint presentation re insurance litigation and settlement strategy (3.1);	3.10	\$1,302.00	
5/10/2023	Jesse Bair	Review and edit BB's fourth interim fee application (.6);	0.60	\$375.00	
5/10/2023	Leakhena Au	Continue drafting PowerPoint presentation re insurance litigation and settlement strategy (1.5);	1.50	\$630.00	
5/11/2023	Jesse Bair	Correspondence with L. Kugler re BB's fourth interim fee application (.1);	0.10	\$62.50	
5/15/2023	Timothy Burns	Participate in conferences with J. Bair re insurance case strategy (.3); participate in call with state court counsel and J. Bair re case insurance strategy (.1); participate in call with state court counsel and J. Bair re Arrowood strategy (.3); additional analysis re Arrowood strategy issues (.1);	0.80	\$560.00	
5/15/2023	Jesse Bair	Participate in conferences with T. Burns re insurance case strategy (.3);	0.30	\$187.50	
5/15/2023	Jesse Bair	Participate in call with state court counsel and T. Burns re case insurance strategy (.1);	0.10	\$62.50	
5/15/2023	Jesse Bair	Analysis regarding potential Arrowood project (.1);	0.10	\$62.50	
5/15/2023	Jesse Bair	Participate in conference with T. Burns and state court counsel re Arrowood strategy (.3);	0.30	\$187.50	
5/16/2023	Jesse Bair	Correspondence with the mediator re call to discuss insurance issues (.1);	0.10	\$62.50	
5/16/2023	Jesse Bair	Review correspondence with L. Kugler re June mediation sessions (.1);	0.10	\$62.50	
5/16/2023	Jesse Bair	Participate in conference with T. Burns and L. Au re Arrowood strategy (.1);	0.10	\$62.50	
5/16/2023	Leakhena Au	Participate in conference with T. Burns and J. Bair re Arrowood strategy (.1);	0.10	\$42.00	
5/16/2023	Timothy Burns	Met with J. Bair and L. Au re Arrowood strategy and assignments (.1);	0.10	\$70.00	
5/17/2023	Timothy Burns	Prepare for call with the mediator re case insurance issues (.3); participate in call with the mediator and J. Bair re case insurance issues (.7);	1.00	\$700.00	
5/17/2023	Jesse Bair	Review and edit draft PowerPoint presentation re potential insurance litigation and settlement strategies (.6);	0.60	\$375.00	
5/17/2023	Jesse Bair	Prepare for call with mediator re case insurance issues (.1);	0.10	\$62.50	
5/17/2023	Jesse Bair	Participate in call with the mediator and T. Burns re case insurance issues (.7);	0.70	\$437.50	
5/23/2023	Jesse Bair	Correspondence with R. Kugler re call to discuss insurance developments (.1);	0.10	\$62.50	
5/23/2023	Timothy Burns	Review correspondence with Stinson and J. Bair re insurance case strategy meeting (.1); additional analysis of insurance litigation strategies in connection with same (.1);	0.20	\$140.00	
5/24/2023	Jesse Bair	Review notice of hearing re professional fee applications and correspond with L. Kugler re same (.1);	0.10	\$62.50	

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5/25/2023	Timothy Burns	Prepare for call with Stinson team re case insurance strategy (.1); participate in call with Stinson team and J. Bair re same (.4);	0.50	\$350.00
5/25/2023	Jesse Bair	Prepare for call with Stinson team re case insurance strategy (.1); participate in call with Stinson team and T. Burns re same (.4);	0.50	\$312.50
5/26/2023	Jesse Bair	Participate in conference with T. Burns re case insurance strategy and next-steps (.1); correspondence with J. Murray re call to discuss insurance issues (.1);	0.20	\$125.00
5/26/2023	Timothy Burns	Conference with J. Bair re case insurance strategy (.1); review correspondence re call with Diocese to discuss same (.1);	0.20	\$140.00
5/30/2023	Timothy Burns	Participate in call with J. Bair and state court counsel re case insurance developments (.1);	0.10	\$70.00
5/30/2023	Jesse Bair	Participate in call with T. Burns and state court counsel re case insurance developments (.1);	0.10	\$62.50
5/31/2023	Timothy Burns	Review correspondence from S. Donato re mediation and insurance (.1); met with J. Bair re same (.1); review correspondence with R. Kugler re same (.1);	0.30	\$210.00
5/31/2023	Jesse Bair	Correspondence with the Diocese re call to discuss case insurance issues (.1);	0.10	\$62.50
5/31/2023	Jesse Bair	Correspondence with R. Kugler re insurance case developments (.1);	0.10	\$62.50

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<b>Total Hours and Fees</b>	<b>15.70</b>	<b>\$9,117.50</b>
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#### Timekeeper Summary

<b>Name</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Brian Cawley	0.10	\$420.00	\$42.00
Jesse Bair	6.30	\$625.00	\$3,937.50
Leakhena Au	4.80	\$420.00	\$2,016.00
Nathan Kuenzi	0.10	\$420.00	\$42.00
Timothy Burns	4.40	\$700.00	\$3,080.00

**Total Due This Invoice: \$9,117.50**

# Burns | Bair

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**Official Committee of Unsecured Creditors of  
the Diocese of Syracuse, New York**

**Issue Date :** 7/20/2023

**Bill # :** 01166

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

<b>Date</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Hours</b>	<b>Amount</b>
6/1/2023	Jesse Bair	Prepare for insurance meeting with the Diocese (.1); correspondence with J. Murray and T. Burns re same (.1);	0.20	\$125.00
6/6/2023	Timothy Burns	Participate in call with Stinson team and J. Bair re insurance case developments and next-steps (.2); follow-up analysis in connection with same (.1);	0.30	\$210.00
6/6/2023	Jesse Bair	Listen to voice-message from Diocese counsel re insurance meeting (.1); correspondence with the Diocese re same (.1);	0.20	\$125.00
6/6/2023	Jesse Bair	Participate in call with Stinson team and T. Burns re insurance case developments and next-steps (.2);	0.20	\$125.00
6/7/2023	Jesse Bair	Correspondence with J. Murray re meeting to discuss case insurance issues (.1);	0.10	\$62.50
6/7/2023	Leakhena Au	Review and send follow up research regarding number of occurrences issue (.2);	0.20	\$84.00
6/7/2023	Timothy Burns	Conference with J. Bair re settlement efforts (.1); reviewed correspondence from J. Bair to opposing counsel re same (.1); reviewed additional correspondence re settlement discussions (.1); responded to correspondence re upcoming mediation (.1);	0.40	\$280.00
6/10/2023	Timothy Burns	Reviewed email from L. Kugler re pre-mediation Committee meeting (.1);	0.10	\$70.00
6/10/2023	Jesse Bair	Review L. Kugler correspondence re upcoming Committee meeting (.1);	0.10	\$62.50
6/10/2023	Jesse Bair	Correspondence with L. Kugler re adjourned hearing on next round of Committee interim fee applications (.1);	0.10	\$62.50
6/12/2023	Timothy Burns	Participate in call with R. Kugler re Arrowood issues (.4); post-call with J. Bair re same (.1);	0.50	\$350.00
6/12/2023	Jesse Bair	Participate in conference with T. Burns re Arrowood issues and strategy (.1); additional analysis re strategy in connection with same (.1);	0.20	\$125.00

6/13/2023 Timothy Burns	Participate in additional call with R. Kugler re Arrowood strategy (.2); participate in call with J. Bair re same (.1);	0.30	\$210.00
6/13/2023 Jesse Bair	Participate in call with T. Burns re Arrowood strategy (.1);	0.10	\$62.50
6/13/2023 Jesse Bair	Draft revised insurance overview and summary materials for use during upcoming mediation (.6);	0.60	\$375.00
6/14/2023 Jesse Bair	Participate in call with T. Burns re Delaware mandamus proceedings against Arrowood (.2);	0.20	\$125.00
6/14/2023 Jesse Bair	Participate in call with T. Burns re case developments and insurance strategy for upcoming mediation (.2);	0.20	\$125.00
6/14/2023 Timothy Burns	Detailed review of Arrowood materials from writ of mandamus proceeding filed against Arrowood in Delaware and unfair claims practices action filed against Arrowood in North Carolina (2.6); participate in call with J. Bair re same (.2); participate in call with R. Kugler re insurance developments and call from the Diocese (.2); participate in call with J. Bair re same (.2); work and analysis in connection with Arrowood regulatory issues and supervision of Arrowood by Delaware insurance commissioner (.8);	4.00	\$2,800.00
6/15/2023 Timothy Burns	Participate in call with state court counsel re insurance mediation and case strategy (.2); participate in call with R. Kugler re same (.2); participate in call with J. Bair re same (.1);	0.50	\$350.00
6/15/2023 Jesse Bair	Participate in call with T. Burns re insurance mediation and case strategy (.1);	0.10	\$62.50
6/19/2023 Timothy Burns	Additional analysis in connection with Arrowood regulatory issues and supervision of Arrowood by Delaware insurance commissioner (.3); correspondence with J. Bair and state court counsel re Arrowood claims count (.1);	0.40	\$280.00
6/19/2023 Jesse Bair	Analysis re Arrowood claim count (.1); correspondence with T. Burns re same (.1);	0.20	\$125.00
6/20/2023 Timothy Burns	Participate in conference with J. Bair re mediation strategy and Arrowood issues (.2);	0.20	\$140.00
6/20/2023 Jesse Bair	Participate in conference with T. Burns re mediation strategy and Arrowood issues (.2);	0.20	\$125.00
6/20/2023 Jesse Bair	Additional analysis of insurer exposures in advance of upcoming mediation (.2); correspondence with Stinson team re insurance overview (.1);	0.30	\$187.50
6/21/2023 Timothy Burns	Review and respond to correspondence from Diocese re insurance meeting (.2); participate in call with state court counsel re same (.2); participate in call with R. Kugler re same (.2);	0.60	\$420.00
6/21/2023 Jesse Bair	Review correspondence with the Diocese re meeting to discuss case insurance issues (.1);	0.10	\$62.50
6/21/2023 Jesse Bair	Begin preparations for upcoming mediation (.1);	0.10	\$62.50
6/22/2023 Timothy Burns	Review and acted on correspondence from the Diocese re insurance meeting (.1); review J. Bair's insurance settlement overview (.1);	0.20	\$140.00

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6/22/2023 Jesse Bair	Review correspondence with state court counsel re insurance mediation issues (.1);	0.10	\$62.50
6/23/2023 Jesse Bair	Participate in conference with T. Burns re insurance mediation strategy (.1);	0.10	\$62.50
6/23/2023 Jesse Bair	Participate in conference with T. Burns re preparations for upcoming Committee meeting (.1); participate in call with R. Kugler and T. Burns re same and case developments (.2);	0.30	\$187.50
6/23/2023 Jesse Bair	Participate in Committee meeting for insurance purposes re mediation strategy (.8);	0.80	\$500.00
6/23/2023 Jesse Bair	Participate in call with the Diocese, parish counsel, T. Burns, and R. Kugler re case insurance issues (.7); participate in post call with R. Kugler and T. Burns re same and next-steps (.4);	1.10	\$687.50
6/23/2023 Timothy Burns	Participate in conference with J. Bair re insurance mediation strategy (.1); participate in additional conference with J. Bair re upcoming Committee meeting (.1); participate in call with J. Bair and R. Kugler re same and case developments (.2); participate in Committee meeting re insurance mediation strategy (.8); participate in call with Debtor and parish counsel re case insurance issues (.7); participate in post call with R. Kugler and J. Bair re insurance next steps (.4); additional insurance analysis in preparation for upcoming mediation (.1);	2.40	\$1,680.00
6/24/2023 Jesse Bair	Analysis re Committee insurance interventions issues (.5); correspondence with L. Au re same and drafting Committee intervention issues (.2);	0.70	\$437.50
6/26/2023 Leakhena Au	Draft Committee motion to intervene in the insurance adversary proceeding (5.1);	5.10	\$2,142.00
6/26/2023 Timothy Burns	Participate in conference with J. Bair re mediation preparations, overall insurance strategy, and next-steps (.3);	0.30	\$210.00
6/26/2023 Jesse Bair	Travel to Syracuse from Madison for mediation [billed at 1/2 travel rate] (7.3);	7.30	\$2,281.25
6/26/2023 Jesse Bair	Participate in conference with T. Burns re mediation preparations, overall insurance strategy, and next-steps (.3);	0.30	\$187.50
6/26/2023 Timothy Burns	Travel to mediation in Syracuse from Madison [billed at 1/2 travel rate] (7.5);	7.50	\$2,625.00
6/27/2023 Nathan Kuenzi	Analysis re coverage and valuation issues in connection with preparing insurance demand letters on TNCRRG and Catholic Mutual (.8);	0.80	\$336.00
6/27/2023 Timothy Burns	Prepare for mediation with J. Bair (.3); participate in full-day mediation session (9.8);	10.10	\$7,070.00
6/27/2023 Jesse Bair	Participate in full-day mediation session (9.8);	9.80	\$6,125.00
6/27/2023 Jesse Bair	Correspondence with Claro re revised insurer claim count (.1);	0.10	\$62.50
6/27/2023 Jesse Bair	Additional analysis re Catholic Mutual exposure (.1); provide instructions to L. Au re drafting Catholic Mutual insurance demands (.2);	0.30	\$187.50

6/27/2023 Jesse Bair	Prepare for day 2 mediation session with T. Burns (.3);	0.30	\$187.50
6/27/2023 Leakhena Au	Draft proposed order for Committee motion to intervene (1.3);	1.30	\$546.00
6/28/2023 Jesse Bair	Participate in day 2 of mediation session (6.8);	6.80	\$4,250.00
6/28/2023 Jesse Bair	Return travel from Syracuse mediation to Madison [billed at 1/2 travel rate] (7.1);	7.10	\$2,218.75
6/28/2023 Alyssa Turgeon	Assist L. Au with drafting insurance demand letters on TNCRRG and Catholic Mutual (1.5);	1.50	\$540.00
6/28/2023 Leakhena Au	Draft insurance demand letters on TNCRRG and Catholic Mutual (4.3);	4.30	\$1,806.00
6/28/2023 Timothy Burns	Participate in day 2 of mediation session (6.8);	6.80	\$4,760.00
6/28/2023 Timothy Burns	Return travel to Madison from Syracuse mediation [billed at 1/2 travel rate] (7.1);	7.10	\$2,485.00
6/29/2023 Jesse Bair	Analyze Claro presentation re CVA claims valuation issues (.2); answer Claro question re Travelers exposure issue (.1); additional analysis re insurer claim count (.1);	0.40	\$250.00
6/29/2023 Jesse Bair	Additional analysis re potential Travelers demand letters (.2);	0.20	\$125.00
6/29/2023 Jesse Bair	Analysis re insurance next-steps in light of recent mediation session outcome (.2);	0.20	\$125.00
6/29/2023 Timothy Burns	Review correspondence with BB team and Claro re claims valuation (.2); review correspondence with BB team re insurance demand letters (.2); review claims data spreadsheet from Claro (.1);	0.50	\$350.00
6/30/2023 Timothy Burns	Exchange correspondence with the mediator re Arrowood issues (.1);	0.10	\$70.00
6/30/2023 Jesse Bair	Review and respond to correspondence with state court counsel re TNCRRG settlement issues (.2);	0.20	\$125.00
6/30/2023 Jesse Bair	Review correspondence with the Committee and state court counsel re mediation and litigation next-steps (.1);	0.10	\$62.50
6/30/2023 Jesse Bair	Review correspondence with the mediator re Arrowood claim monitor issues (.1);	0.10	\$62.50

<b>Total Hours and Fees</b>	<b>95.00</b>	<b>\$50,141.50</b>
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## EXPENSES

<b>Date</b>	<b>Description</b>	<b>Amount</b>
6/26/2023	Delta Airlines, T. Burns (MSN-SYR June 26-28)	\$1,276.40
6/26/2023	Hotel, T. Burns (2 nights)	\$521.36
6/26/2023	Hotel, J. Bair (2 nights)	\$521.36
6/26/2023	Travel meal, J. Bair and T. Burns	\$73.32
6/26/2023	Delta WiFi Onboard, J. Bair	\$4.95
6/26/2023	Uber, J. Bair (airport to hotel)	\$79.53
6/26/2023	Travel meal, T. Burns	\$9.45
6/26/2023	Delta Airlines, J. Bair (MSN-SYR June 26-28)	\$1,026.40
6/28/2023	Travel meal, T. Burns	\$20.94
6/28/2023	Travel meal, T. Burns	\$21.10

6/28/2023	Travel meal, J. Bair	\$12.00
6/28/2023	Travel meal, J. Bair	\$20.59
6/28/2023	Airport parking, J. Bair	\$30.00
<b>Total Expenses</b>		<b>\$3,617.40</b>

**Timekeeper Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	1.50	\$360.00	\$540.00
Jesse Bair	14.40	\$312.50	\$4,500.00
Jesse Bair	25.10	\$625.00	\$15,687.50
Leakhena Au	10.90	\$420.00	\$4,578.00
Nathan Kuenzi	0.80	\$420.00	\$336.00
Timothy Burns	14.60	\$350.00	\$5,110.00
Timothy Burns	27.70	\$700.00	\$19,390.00

**Total Due This Invoice: \$53,758.90**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
[www.BurnsBair.com](http://www.BurnsBair.com)

**Official Committee of Unsecured Creditors of  
the Diocese of Syracuse, New York**

**Issue Date :** 8/23/2023

**Bill # :** 01194

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

<b>Date</b>	<b>Timekeeper</b>	<b>Narrative</b>	<b>Hours</b>	<b>Amount</b>
7/1/2023	Jesse Bair	Review correspondence from Committee member re insurance and case strategy (.1);	0.10	\$62.50
7/5/2023	Timothy Burns	Reviewed BB emails re assignment and organization of partial summary judgment briefing (.2);	0.20	\$140.00
7/5/2023	Leakhena Au	Draft motion for partial summary judgment on OLT coverage issues (4.3);	4.30	\$1,806.00
7/5/2023	Katie Sticklen	Research updated premises endorsement caselaw in New York for OLT summary judgment motion (2.4);	2.40	\$907.20
7/5/2023	Jesse Bair	Detailed analysis re Travelers' OLT argument and responses to same (.6); provide instructions to L. Au re preparing partial motion for summary judgment on the OLT issue (.3);	0.90	\$562.50
7/5/2023	Jesse Bair	Participate in call with state court counsel re LMI exposure and settlement strategy (.4); conduct supplemental analysis re LMI exposure in response to call (.5); additional correspondence with state court counsel re results of supplemental analysis (.1);	1.00	\$625.00
7/6/2023	Jesse Bair	Analysis re Midland liquidation issues and Guarantee Fund Access (.2); correspondence with state court counsel re same (.1);	0.30	\$187.50
7/6/2023	Katie Sticklen	Continue researching updated premises endorsement caselaw in New York for OLT summary judgment motion (1.0); draft email memorandum summarizing OLT research results (.8);	1.80	\$680.40
7/6/2023	Leakhena Au	Review research findings by K. Sticklen and conduct additional caselaw research on OLT policies in NY (2.6); continue drafting motion for partial summary judgment on OLT policies (4.9);	7.50	\$3,150.00
7/6/2023	Jesse Bair	Participate in detailed conference with T. Burns re LMI strategy, insurance demand letters, and potential summary judgment motions against the insurers (.7);	0.70	\$437.50

7/6/2023	Timothy Burns	Participate in detailed conference with J. Bair re LMI strategy, insurance demand letters, and potential summary judgment motions against the insurers (.7); participate in call with state court counsel re same (.3); participate in post-call with J. Bair re same (.2); review correspondence from BB to state court counsel re Midland analysis (.1); review email analysis of Claro re Travelers' claims (.2);	1.50	\$1,050.00
7/6/2023	Jesse Bair	Participate in supplemental conference with T. Burns re outcome of call with state court counsel and LMI settlement strategy (.2);	0.20	\$125.00
7/7/2023	Alyssa Turgeon	Review and edit motion for partial summary judgment on OLT issue, including completion of cite-check re same (2.0);	2.00	\$720.00
7/7/2023	Leakhena Au	Continue drafting motion for partial summary judgment on OLT coverage (3.2); provide instructions to A. Turgeon and K. Dempski re additional edits needed to same (.3);	3.50	\$1,470.00
7/7/2023	Karen Dempski	Edit motion for partial summary judgment re local court requirements (.3);	0.30	\$108.00
7/8/2023	Leakhena Au	Revise draft partial motion for summary judgment on OLT policies (1.3);	1.30	\$546.00
7/10/2023	Brian Cawley	Analyze coverage details in connection with upcoming insurance demand letters (.3);	0.30	\$126.00
7/11/2023	Brian Cawley	Analyze materials relevant to number of occurrence issue (.7); begin outlining and summarizing number of occurrence issue for upcoming motion for summary judgment re same (2.6);	3.30	\$1,386.00
7/11/2023	Jesse Bair	Participate in call with T. Burns re insurance case updates and next-steps (.1);	0.10	\$62.50
7/11/2023	Jesse Bair	Analysis re number of occurrence issue in connection with Travelers' coverage position (.2); correspondence with B. Cawley re drafting partial summary judgment motion concerning same (.1);	0.30	\$187.50
7/11/2023	Jesse Bair	Analysis re consent to settle issue in connection with LMI/Interstate's coverage position (.2); correspondence with L. Au and B. Cawley re drafting partial summary judgment motion concerning same (.1);	0.30	\$187.50
7/11/2023	Timothy Burns	Participate in call with R. Kugler re case developments (.1); review correspondence from J. Bair re partial summary judgment briefing (.2); participate in call with J. Bair re insurance case update and next-steps (.1); review correspondence from Claro re mediation projects (.1);	0.50	\$350.00
7/11/2023	Leakhena Au	Begin drafting motion for partial summary judgment re consent to settle issue in connection with LMI/Interstate's coverage position (2.0);	2.00	\$840.00
7/12/2023	Leakhena Au	Continue drafting motion for partial summary judgment re consent to settle issue in connection with LMI/Interstate's coverage position (3.1);	3.10	\$1,302.00

7/12/2023 Brian Cawley	Begin drafting motion for partial summary judgment on number of occurrences issue (4.7);	4.70	\$1,974.00
7/12/2023 Timothy Burns	Participate in calls with state court counsel re LMI's recent settlement offer (.3);	0.20	\$140.00
7/12/2023 Jesse Bair	Analysis re LMI's recent mediation offer (.1);	0.10	\$62.50
7/13/2023 Jesse Bair	Prepare for hearing on interim professional fee applications (.2); participate in hearing on interim professional fee applications (.9);	1.10	\$687.50
7/13/2023 Leakhena Au	Continue drafting motion for partial summary judgment re consent to settle issue in connection with LMI/Interstate's coverage position (4.8);	4.80	\$2,016.00
7/13/2023 Brian Cawley	Analysis of LMI/Interstate policy provisions in connection with consent to settlement partial summary judgment motion (.6);	0.60	\$252.00
7/13/2023 Brian Cawley	Supplemental research and analysis of New York case law regarding number of occurrences issue (2.5);	2.50	\$1,050.00
7/14/2023 Brian Cawley	Continue drafting motion for partial summary judgment on number of occurrence issue (2.1); continue analyzing New York case law in connection with same (1.4);	3.50	\$1,470.00
7/14/2023 Jesse Bair	Review L. Kugler correspondence re upcoming Committee meeting (.1);	0.10	\$62.50
7/14/2023 Leakhena Au	Finalize draft partial summary judgment motion on consent to settle in connection with LMI/Interstate (.4);	0.40	\$168.00
7/15/2023 Brian Cawley	Continue drafting motion for partial summary judgment on number of occurrence issue (1.7);	1.70	\$714.00
7/17/2023 Leakhena Au	Draft insurance demand letters re Travelers and LMI/ Interstate claims (4.3);	4.30	\$1,806.00
7/17/2023 Nathan Kuenzi	Prepare for conference with J. Bair re insurance demand letters (.1); participate in conference with J. Bair re drafting same (.1);	0.20	\$84.00
7/17/2023 Nathan Kuenzi	Analyze POC allegations and draft Arrowood insurance demand letters (3.6);	3.60	\$1,512.00
7/17/2023 Brian Cawley	Additional drafting of motion for partial summary judgment on number of occurrence issue (4.0); conduct supplemental case law research in connection with same (1.9);	5.90	\$2,478.00
7/17/2023 Jesse Bair	Draft Order approving BB's interim fee application (.1); draft letter to the Court re same and providing requested information (.2); correspondence with L. Kugler re same (.1);	0.50	\$312.50
7/17/2023 Jesse Bair	Continue analysis regarding potential Travelers insurance demands (.4); provide instructions to L. Au re drafting same (.2);	0.60	\$375.00
7/17/2023 Jesse Bair	Analysis re potential Arrowood insurance demands (.7); provide instructions to N. Kuenzi re drafting same (.1);	0.80	\$500.00

7/17/2023 Jesse Bair	Analysis re potential LMI and Interstate insurance demands (.9); correspondence with N. Kuenzi and L. Au re drafting same (.1); answer follow-up questions from L. Au re same (.1);	1.10	\$687.50
7/18/2023 Jesse Bair	Additional analysis re potential supplemental Travelers demand letters (.4); correspondence with L. Au re same (.1);	0.50	\$312.50
7/18/2023 Leakhena Au	Draft additional Travelers insurance demand letters (1.9);	1.90	\$798.00
7/19/2023 Brian Cawley	Additional analysis of Travelers policy provisions in connection with summary judgment motion (.9); additional analysis of case law research in connection with same (2.3); continue drafting partial summary judgment motion on number of occurrences issue (1.7);	4.90	\$2,058.00
7/19/2023 Jesse Bair	Review draft press release re Committee/Diocese Plan (.1);	0.10	\$62.50
7/19/2023 Jesse Bair	Review correspondence with Claro re outstanding data requests in connection with claim valuation and insurer allocation issues (.1);	0.10	\$62.50
7/20/2023 Jesse Bair	Participate in conference with T. Burns re insurance strategy (.2);	0.20	\$125.00
7/20/2023 Jesse Bair	Answer B. Cawley question re number of occurrences summary judgment brief (.1);	0.10	\$62.50
7/20/2023 Timothy Burns	Participate in conference with J. Bair re case insurance strategy (.2); participate in call with state court counsel re same (.1);	0.30	\$210.00
7/20/2023 Brian Cawley	Continue analyzing number of occurrences case law and Travelers policy provisions in connection with summary judgment brief (1.3); finish drafting motion for partial summary judgment on number of occurrences issue (5.4); conference with J. Bair re questions re same (.1);	6.80	\$2,856.00
7/24/2023 Jesse Bair	Participate in conference with Stinson team and state court counsel re case insurance strategy (.6);	0.60	\$375.00
7/24/2023 Timothy Burns	Participate in conference with Stinson team and state court counsel re case insurance strategy (.6);	0.60	\$420.00
7/26/2023 Jesse Bair	Review correspondence with the Committee, Stinson, and state court counsel re issues re Diocesan settlement announcement (.1);	0.10	\$62.50
7/27/2023 Jesse Bair	Review additional correspondence with R. Kugler and state court counsel re Diocesan settlement (.1);	0.10	\$62.50
7/27/2023 Jesse Bair	Participate in call with R. Kugler and E. Caldie re insurance strategy and next-steps re same (.2);	0.20	\$125.00
7/28/2023 Timothy Burns	Participate in detailed call with Stinson team re case strategy, planning, and assignments (.8);	0.80	\$560.00
7/29/2023 Timothy Burns	Reviewed and revised task list from R. Kugler re case management and strategy (.3);	0.30	\$210.00
7/31/2023 Nathan Kuenzi	Analysis of Arrowood information in connection with Rule 2004 requests to Arrowood (.2);	0.20	\$84.00

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<b>Total Hours and Fees</b>	<b>92.80</b>	<b>\$41,984.60</b>
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#### Timekeeper Summary

<b>Name</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
Alyssa Turgeon	2.00	\$360.00	\$720.00
Brian Cawley	34.60	\$420.00	\$14,532.00
Jesse Bair	10.20	\$625.00	\$6,375.00
Karen Dempski	0.30	\$360.00	\$108.00
Katie Sticklen	4.20	\$378.00	\$1,587.60
Leakhena Au	33.10	\$420.00	\$13,902.00
Nathan Kuenzi	4.00	\$420.00	\$1,680.00
Timothy Burns	4.40	\$700.00	\$3,080.00

**Total Due This Invoice: \$41,984.60**

## **EXHIBIT C**

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

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In re:

Case No. 20-30663

The Roman Catholic Diocese of Syracuse,  
New York,

Chapter 11

Debtor.

Judge Wendy A. Kinsella

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**ORDER APPROVING FIFTH INTERIM APPLICATION OF  
BURNS BAIR LLP, SPECIAL INSURANCE COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS, FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

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This matter is before the Court on the *Fifth Interim Application of Burns Bair LLP, Special Insurance Counsel to the Official Committee of Unsecured Creditors, for Allowance of Compensation and Reimbursement of Expenses*. Based on the record, files, and proceedings in this matter:

**IT IS ORDERED:**

1. Compensation to Burns Bair LLP in the amount of \$179,728.10 and reimbursement of expenses in the amount of \$9,219.57<sup>1</sup> is ALLOWED.
2. The Debtor may pay Burns Bair LLP the amount allowed under paragraph 1.

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<sup>1</sup> This expense amount reflects a reduction of \$80.90 for PACER fees that were included on Burns Bair's invoice for April time.